

February 27, 2013

VIA CERTIFIED MAIL - 7005 1820 0004 4100 4909

Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

VIA CERTIFIED MAIL - 7006 3450 0003 0514 9546

Indiana Department of Environmental Management Office of Solid and Hazardous Waste Management 100 North Senate Avenue Mail Code 61-53 IGCN 1003 Indianapolis, IN 46206

RE:

2012 Annual Hazardous Waste Export Report Heritage Environmental Services, LLC IND 093219012

To Whom It May Concern:

The purpose of this letter is to provide the 2012 Annual Hazardous Waste Export Report for Heritage Environmental Services, LLC (Heritage). This report addresses hazardous waste shipments performed outside of the United States for calendar year 2012. The following information is provided in accordance with 40 CFR 262.56:

1. Exporter

Heritage Environmental Services, LLC 7901 West Morris Street Indianapolis, IN 46231 IND093219012

- 2. Calendar Year: 2012
- 3. Consignee

Stablex Canada, Inc. 760 Boul. Industriel Blainville, Quebec J7C 3V4 Canada

100 3/4/2013

4. i. Waste Description:

RQ, UN1463, Waste Chromium Trioxide, Anhydrous, 5.1(8), PGII

EPA Hazardous Waste Numbers:

D001, D002, D004, D007

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped three (3) shipments with a total quantity of 444 pounds.

ii. Waste Description:

RQ, UN1479, Waste Oxidizing Solid, N.O.S, 5.1, PGII, (Potassium Nitrate, Sodium Nitrite, Sodium Nitrate)

EPA Hazardous Waste Numbers:

D001, D003, D005, D007

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped seven (7) shipments with a total quantity of 12,256 pounds.

iii. Waste Description:

RQ, UN1479, Waste Oxidizing Solid, N.O.S, 5.1, PGII, (Sodium Nitrate, 1-Bromo-3-Chloro-5,5-Dimethylhydantion)

EPA Hazardous Waste Numbers:

D001

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 35 pounds.

iv. Waste Description:

RQ, UN1479, Waste Oxidizing Solid, N.O.S, 5.1, PGII, (Sodium Chlorate)

EPA Hazardous Waste Numbers:

D001

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 735 pounds.

v. Waste Description:

RQ, UN1755, Waste Chromic Acid solution, 8, PGII

EPA Hazardous Waste Numbers:

D002, D007

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped two (2) shipments with a total quantity of 5,701 pounds.

vi. Waste Description:

RQ, UN2922, Waste Corrosive Solids, Toxic, N.O.S., 8(6.1), PGII, (Nitric Acid)

EPA Hazardous Waste Numbers:

K062, D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 9,844 pounds.

vii. Waste Description:

RQ, UN2922, Waste Corrosive Solids, Toxic, N.O.S., 8(6.1), PGII, (Hydrofluoric Acid)

EPA Hazardous Waste Numbers:

D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 1,791 pounds.

viii. Waste Description:

RQ, UN2923, Waste Corrosive Solids, Toxic, N.O.S., 8(6.1) PGII, (Sulfuric Acid, Sulfonic Acid)

4

EPA Hazardous Waste Numbers:

F006, D002, D008

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped six (6) shipments with a total quantity of 5,162 pounds

ix. Waste Description:

RQ, UN3077, Waste Environmentally Hazardous Substances, Solid, N.O.S., 9, PGIII, (Chromium, Lead)

EPA Hazardous Waste Numbers:

D005, D006, D007, D008

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped nine (9) shipments with a total quantity of 128,974 pounds

x. Waste Description:

RQ, UN3082, Waste Environmentally Hazardous Substances, Liquid, N.O.S., 9, PGIII, (Chromium)

EPA Hazardous Waste Numbers:

D002, D007

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped three (3) shipments with a total quantity of 10,365 pounds.

xi. Waste Description:

RQ, UN3084, Waste Corrosive Solids, Oxidizing, N.O.S., 8(5.1), PGIII, (Sodium Hydroxide, Sodium Nitrite, Sodium Nitrate, Potassium Hydroxide)

EPA Hazardous Waste Numbers:

D001, D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 4,570 pounds.

xii. Waste Description:

RQ, UN3085, Waste Oxidizing Solid, Corrosive, N.O.S., 5.1(8), PGII, (Sodium Nitrate)

EPA Hazardous Waste Numbers:

D001, D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped three (3) shipments with a total quantity of 3,135 pounds.

xiii. Waste Description:

RQ, UN3085, Waste Oxidizing Solid, Corrosive, N.O.S., 5.1(8), PGII, (Barium Peroxide)

EPA Hazardous Waste Numbers:

D001, D005

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 2,820 pounds.

xiv. Waste Description:

RQ, UN3085, Waste Oxidizing Solid, Corrosive, N.O.S., 5.1(8), PGII, (Sodium Permanganate, Sodium Hydroxide)

EPA Hazardous Waste Numbers:

D001, D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 164 pounds.

xv. Waste Description:

RQ, UN3087, Waste Oxidizing Solid, Toxic, N.O.S., 5.1,(6.1), PGII, (Barium Nitrate)

EPA Hazardous Waste Numbers:

D001, D005

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 243 pounds.

xvi. Waste Description:

RQ, UN3087, Waste Oxidizing Solid, Toxic, N.O.S., 5.1,(6.1), PGII, (Barium Peroxide)

EPA Hazardous Waste Numbers:

D001, D005

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 608 pounds.

xvii. Waste Description:

RQ, UN3087, Waste Oxidizing Solid, Toxic, N.O.S., 5.1,(6.1), PGII, (Barium, Stronium Peroxide)

EPA Hazardous Waste Numbers:

D001, D005

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 614 pounds.

xviii. Waste Description:

RQ, UN3093, Waste Corrosive Liquids, Oxidizing, N.O.S., 8(5.1), PGII, (Phosphoric Acid, Phosphate)

EPA Hazardous Waste Numbers:

D001, D002, D007

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 78 pounds.

xix. Waste Description:

RQ, UN3098, Waste Oxidizing Liquid, Corrosive, N.O.S., 5.1(8), PGII, (Sodium Nitrate, Sodium Hydroxide)

EPA Hazardous Waste Numbers:

D001, D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped three (3) shipments with a total quantity of 6,190 pounds.

xx. Waste Description:

RQ, UN3260, Waste Corrosive Solids, Acidic, Inorganic, N.O.S., 8, PGII, (Hydrofluoric Acid, Sulfuric Acid, Nitric Acid, Hydrochloric Acid)

EPA Hazardous Waste Numbers:

K062, F006, D002, D004, D007, D008

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped five (5) shipments with a total quantity of 7,787 pounds.

xxi. Waste Description:

RQ, UN3262, Waste Corrosive Solids, Basic, Inorganic, N.O.S., 8, PGII, (Sodium Hydroxide)

EPA Hazardous Waste Numbers:

D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 192 pounds.

xxii. Waste Description:

RQ, UN3264, Waste Corrosive Liquids, Acidic, Inorganic, N.O.S., 8, PGII, (Hydrofluoric Acid, Nitric Acid)

EPA Hazardous Waste Numbers:

K062, F009, D002, D004, D007, D008

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped six (6) shipments with a total quantity of 59,229 pounds.

10

xxiii. Waste Description:

RQ, UN3264, Waste Corrosive Liquids, Acidic, Inorganic, N.O.S., 8, PGII, (Hydrochloric Acid, Sulfuric Acid, Chromic Acid, Phosphoric Acid)

EPA Hazardous Waste Numbers:

K062, F006, D002, D007, D008

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped four (4) shipments with a total quantity of 6,410 pounds.

xxiv. Waste Description:

RQ, UN3266, Waste Corrosive Liquid, Basic, Inorganic, N.O.S., 8, PGII, (Sodium Hydroxide, Potassium Hydroxide)

EPA Hazardous Waste Numbers:

D002, D006, D007

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped three (3) shipments with a total quantity of 7,781 pounds.

xxv. Waste Description:

RQ, UN3288, Waste Toxic Solid, Inorganic, N.O.S., 6.1, PGII, (Antimony Trifluoride, Antimony Trioxide)

EPA Hazardous Waste Numbers:

D004, D008

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped two (2) shipments with a total quantity of 913 pounds.

xxvi. In addition to the above material generated by Heritage Environmental Services, LLC, Heritage also acted as intermediary arranging for export for the following material generated by the BP Products North America, Inc. (EPA ID# IND000810861):

Waste Description:

RQ, UN3077, Waste Environmentally Hazardous Substances, Solid, N.O.S., 9, PGIII, (Benzene, Lead)

EPA Hazardous Waste Numbers:

K048, K050, K051, F037, F038, D008

Transporter Information:

Heritage Transport, LLC 7901 West Morris Street Indianapolis, IN 46231 USA IND058484114

The Indiana Railroad Company 101 West Ohio Street, Suite 1600 Indianapolis, IN 46204 USA IND000118877

CSX Corporation 500 Water Street, J-907 Jacksonville, FL 32202 USA FLD006921340

Canadian Pacific Railway 355 Portage, STE 900 Winnipeg, MB R3B 3M6 CANADA NYD986968139

Quebec-Gatineau Railway 6700 Avenue du Parc, Suite 110 Montreal, QC H2V 4H9 CANADA

Number/Amount of Shipments:

Heritage shipped six (6) shipments with a total quantity of 169,460 pounds.

5. Waste Minimization

Heritage actively promotes waste minimization. A description of our waste minimization activities is attached for reference.

If there are any question or comments regarding this information, please contact me at 317/486-2727.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Sincerely,

HERITAGE ENVIRONMENTAL SERVICES, LLC.

Christopher Ray

Compliance Manager

cc: Corporate Compliance



MEMORANDUM

TO:

RCRA Part B Federal File

Operating Record

FROM:

Christopher Ray

DATE:

February 27, 2013

RE:

Waste Minimization Certification

The purpose of this memorandum is to provide the annual waste minimization certification in accordance with Heritage's Part B federal permit, condition I.G.

Heritage Environmental Services, LLC (Heritage) has a program in place to reduce the volume and toxicity of generated hazardous wastes to the degree determined to be economically practicable. Also, the practicable methods of storage and treatment currently available to Heritage are those practicable methods that minimize, to the extent possible, the present and future threat to human health and the environment.

In 2012, Heritage performed the following specific waste minimization efforts at the Indianapolis Treatment Center:

- Conducts operations to recover metallic mercury and cinnabar from mercury salts and mercury-contaminated wastestreams for commercial use. These wastestreams had typically been diverted to Canada for land disposal.
- 2. Operates a patented cyanide destruction process that does not rely on toxic reagents such as chlorine gas for waste treatment.
- 3. Operates high-pressure filter presses to reduce the volume of filtercake requiring subsequent stabilization and disposal.
- 4. Conducts and implements ongoing spill prevention, preventative maintenance, inspection and housekeeping programs to minimize environmental releases.

In summary, Heritage continues to promote an aggressive, ongoing commitment to waste minimization. Pollution prevention and waste minimization enjoy support from senior management as being essential to our long-term interests.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the

Memo re: Waste Minimization Certification

February 27, 2013

Page 2

information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certification Period: January 2012- January 2013

Christopher Ray

Plant Compliance Manager

cc: Corporate Compliance

901 West Morris Street ttn: Christopher Ray Idianapolis, IN



Office of Enforcement and Compliance Assurance

Affred of Fidural Activities

EPA Mail

Route

sterness Compliance Assurance Division (2254A) P. A.

200 Pannsslvania Avanue, NW Nushington, DC 20460

Mailstop ARIEL RIOS NORTH

Department: 2254A

Certified

To: International Compliance

70051820000441004909